

Rasottis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEXIA SA/NV; DEXIA HOLDINGS, INC.;
FSA ASSET MANAGEMENT LLC; DEXIA
CRÉDIT LOCAL SA,

Plaintiffs,

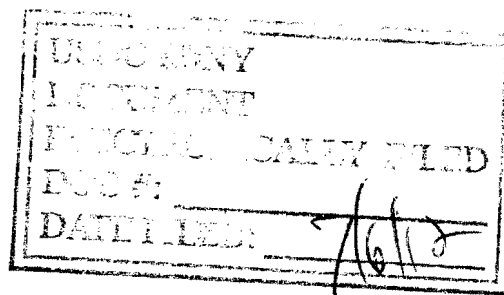
12-cv-4761 (JSR)

v.

BEAR STEARNS & CO. INC., THE BEAR
STEARNS COMPANIES, INC., BEAR
STEARNS ASSET BACKED SECURITIES I
LLC, EMC MORTGAGE LLC (f/k/a EMC
MORTGAGE CORPORATION),
STRUCTURED ASSET MORTGAGE
INVESTMENTS II INC., J.P. MORGAN
ACCEPTANCE CORPORATION I, J.P.
MORGAN MORTGAGE ACQUISITION
CORPORATION, J.P. MORGAN SECURITIES
LLC (f/k/a JPMORGAN SECURITIES INC.),
WAMU ASSET ACCEPTANCE CORP.,
WAMU CAPITAL CORP., WAMU
MORTGAGE SECURITIES CORP.,
JPMORGAN CHASE & CO., and JPMORGAN
CHASE BANK, N.A.,

Defendants.

**STIPULATION AND
[PROPOSED] ORDER
EXTENDING TIME TO
RESPOND TO COMPLAINT
AND SETTING CONTINGENT
BRIEFING SCHEDULE**



WHEREAS, on June 18, 2012, this action was removed to the United States

District Court for the Southern District of New York;

WHEREAS, Plaintiffs have stated that they may file a motion to remand;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties
hereto, through their respective counsel, subject to approval by this Court, that:

1. The time for Defendants to answer, move or otherwise respond to the Amended Complaint is stayed pending entry of an order by this Court disposing of Plaintiffs'

forthcoming motion to remand, or until the period within which Plaintiffs may file a timely motion to remand expires, or until the date on which Defendants receive written notice from Plaintiffs that Plaintiffs will not be filing a motion to remand.

2. Upon the entry of an order disposing of Plaintiffs' forthcoming motion to remand, or upon the date on which Plaintiffs' time to file a timely motion to remand expires, or upon the date on which Defendants receive written notice from Plaintiffs that Plaintiffs will not be filing a motion to remand, Defendants shall have forty-five (45) days to answer, move, or otherwise respond to the Complaint.

3. Plaintiffs shall have thirty (30) days to oppose any motion to dismiss filed pursuant to paragraph 2.

4. Defendants shall have fifteen (15) days to reply to any opposition filed pursuant to paragraph 3.

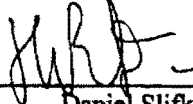
5. Neither Plaintiffs nor Defendants waive any right to seek from each other or the Court, or to oppose, any further adjournments or extensions of these deadlines or any other deadlines.

6. Entry into this stipulation shall not waive any right, claim or other defense, including, without limitation, defenses relating to jurisdiction and venue, all of which are expressly preserved.

June ~~22~~ 2012

CRAVATH, SWAINE & MOORE LLP

By: _____

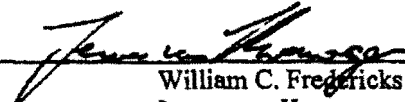

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BERNSTEIN LITOWITZ BERGER & GROSSMAN LLP

By: _____

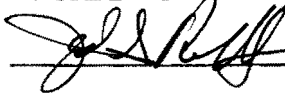

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Counsel for Plaintiffs Dexia SA/NV, Dexia Holdings, Inc., FSA Asset Management LLC, and Dexia Cr dit Local SA

Denied

SO ORDERED



Hon. Jed S. Rakoff, U.S.D.J.

7-5-12